SBCAG
santa barbara county association of governments

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Christopher Calfee
Senior Counsel
Governor's Office of Planning and Research
1400 Tenth Street
Sacramento, CA 95814

Re: **Comments on OPR's Preliminary Evaluation of Alternative Methods of CEQA Transportation Impact Analysis – LOS Alternatives**

Dear Mr. Calfee:

Thank you for the opportunity to comment on OPR's preliminary evaluation of alternatives to traditional transportation measures of level of service (LOS). As the Metropolitan Planning Organization, Regional Transportation Planning Agency, and Congestion Management Agency for Santa Barbara County, the Santa Barbara County Association of Governments (SBCAG) is interested in providing feedback on the alternative methods and the potential implications for our agency and the local partner jurisdictions which we serve.

In August 2013, the SBCAG Board of Directors adopted the Santa Barbara Regional Transportation Plan-Sustainable Community Strategy (RTP-SCS). The 2040 RTP-SCS plans how the region will meet its transportation needs for the 30-year period from 2010 to 2040, considering existing and projected future land use patterns as well as forecast population and job growth. The RTP-SCS preferred scenario emphasizes a transit-oriented development approach to land use and housing, by focusing new growth in an urban infill pattern oriented around transit service and identifies existing and future transit priority areas within which the alternative methods of transportation analysis may apply after July 1, 2014 for environmental review purposes.

There is a correlation between the goals and objectives in our RTP-SCS and those that will be used by OPR in developing the alternative criteria. SB 743 and the creation of alternative methods for transportation analysis in transit priority areas are steps in the right direction. As discussed in the OPR memorandum, use of traditional metrics (such as automobile delay or volume/capacity ratios) within environmental review documents has led to the increasing reliance on mitigation measures involving capacity-increasing improvements. As recent literature points out, this approach to mitigation of traffic impacts is not always the best solution or even the most environmentally feasible one. In particular, it can be infeasible in heavily urbanized areas, where infill or transit-oriented development is most likely to occur. Therefore, we applaud OPR's efforts to modernize the State's metrics for environmental review of transportation impacts, acknowledging the limitations of traditional transportation analysis methods, and providing a thorough range of options for analysis.

Application of the alternative transportation analysis methods in practice will present a number of important challenges not addressed in OPR's preliminary analysis. Our preliminary comments regarding some challenges of application specific to our region are listed below.

1. **Lead agencies should have flexibility to choose which impact metric to apply outside transit priority areas.** SB 743 requires OPR to revise the CEQA Guidelines to establish criteria for determining the significance of transportation impacts of projects within transit priority areas and also gives OPR the discretion to change such criteria outside of transit priority areas. Our 2040 RTP-SCS currently identifies only one existing transit priority area on the South Coast area of Santa Barbara County (see Attachment 1). If a project, such as a highway project, traverses both a transit priority area and the area outside it, the lead agency would be responsible for applying different methodologies for different portions of the project, thereby complicating the analysis and potentially increasing costs. Or, if a project were located just outside the boundary of a transit priority area, for example, then revised CEQA Guidelines that established differential impact metrics might result in inconsistent mitigation standards being applied to impacts within the transit priority area. To allow the greatest flexibility to address specific circumstances, the revised CEQA guidelines should allow lead agencies to choose which impact metric to apply outside transit priority areas.

2. **Revised CEQA Guidelines should consider to the effect on existing AB 1600 traffic impact fees structures.** The use of traditional LOS methodologies (e.g., volume-to-capacity ratios) are presently often embedded in city and county General Plan and Circulation Element policies. Furthermore, project-specific trip results in traffic impact studies are often used to derive development impact fees for those jurisdictions that maintain AB 1600 impact fee programs. In most cases, the methodology used to derive these estimates is the project trip generation and project trip distribution method, which would no longer apply within transit priority areas under certain alternative methodologies under consideration. If the new impact metric does not require calculation of trips generated, local jurisdictions may have to re-tool their impact fee programs, a time-consuming and expensive prospect.

   In evaluating alternative impact metrics, OPR needs to consider the "nexus" and "proportionality" relationship between impact and mitigation in this context for all alternative metrics under consideration. For each alternative metric, how will lead agencies demonstrate the required nexus between the impact and the mitigation?

3. **Certain Alternative Metrics May Require Substantial Revision of Existing Congestion Management Programs.** As mentioned above, SBCAG is the Congestion Management Agency (CMA) for Santa Barbara County. As the CMA, we are required to implement and maintain a Congestion Management Program for the region. Public Resources Code Section 65089(a)(1)(A) requires the CMA to establish traffic LOS standards for the region's state highways and principal arterials, unless these are located within an infill opportunity zone. (There are presently no infill opportunity zones in our region.) Furthermore, it requires LOS be measured using specific methods (such as the Circular 212 or those consistent with the Highway Capacity Manual). Subparagraph (a)(1)(B) states that that:

   > *In no case shall the LOS standards established be below LOS E or the current level, whichever is farthest from LOS A except when the area is in an infill opportunity zone. When the level of service on a segment or at*

an intersection fails to attain the established LOS standard outside an infill opportunity zone, a deficiency plan shall be adopted.

SBCAG's 2009 Congestion Management Plan also contains project-specific impact thresholds (based on LOS) for use by local lead agencies in environmental review documents and recommendations for transportation impact studies. Furthermore, the Congestion Management Program includes a program to analyze the impacts of land use decisions made by local jurisdictions on the regional network, per the requirements of Public Resources Code Section 65089(b)(1)(B)(4). Depending on the impact metrics selected, SBCAG staff is considering a revision to its Congestion Management Program policies and an update to its Congestion Management Plan. Revising existing Congestion Management Programs will entail considerable effort and expense, as well as coordination with affect local jurisdictions.

4. **Advantages of Multi-Modal Level of Service Alternative Metric**. Given that the Public Resources Code requires the use of a LOS standard that is consistent with the Highway Capacity Manual for preparation of Congestion Management Plans, the Multi-Modal LOS metric for measuring transportation impacts in transit priority areas has certain advantages that deserve consideration:

    - The metric is contained in the 2010 Highway Capacity Manual, which is has been an industry standard manual for transportation professionals for many years. It provides clear guidance on how the methodology is to be completed and how calculations are to be performed.
    - A clear, quantitative nexus can be shown between an impact and mitigation for TDM, transit, and bicycle measures in environmental documents.
    - There are case studies where Multi-Modal LOS has been used for planning-level purposes (e.g., the City of Pasadena).

    We agree that this methodology may be more time-consuming than the other metrics listed. However, the other metrics listed disregard work that has been done over the last several years in developing the Multi-Modal LOS methodology and including it in the Highway Capacity Manual.

5. **Alternative Impact Metrics May Require Substantially Updated and Expanded Modeling Tools**. With the implementation of SB 743, traffic impact assessment metrics would transition to an entirely new paradigm by taking into account alternative transportation modes in transit priority areas. However, the calculation of such traffic impacts may introduce new modeling requirements that may not be able to be met adequately with existing tools. For example, regional travel demand models, such as the one maintained by SBCAG, are good at regional area analysis, but lack the resolution for micro-analysis needed for particular projects. Conversely, local models may have the necessary resolution, but lack the geographic coverage to calculate broad measures such as vehicle miles traveled and vehicle hours traveled. Some sub-regional models in use today also have no mode choice step (auto only). Depending on the impact criteria selected by OPR, these models may have to be upgraded in the future at a significant cost (the Goleta area traffic model update was estimated at $360,000[1]), if they are to be used for traffic impact assessment. In evaluating alternative measures,

[1] http://www.countyofsb.org/uploadedFiles/pwd/Roads/Draft_GTIP_Report_10-2010.pdf

OPR staff should consider these costs and what tools would be needed to apply particular measures in practice.

6. **Alternative Metrics Call for New Trip Generation Rates**. Certain alternative impact measures will necessitate the development of new trip generation rates for infill areas in order to reliably predict the number of person trips (and their associated mode choices) that will be generated by the development. Transportation impact analysis is presently conducted by estimating the number of trips by cars, trucks, and other modes of travel that may result from a proposed project – known as "trip-generation." Currently, practitioners typically use trip-generation rates published by the Institute of Transportation Engineers (ITE).

   For the most part, ITE's trip-generation rates are based on data obtained at suburban locations that lack good transit or bicycle and pedestrian facilities. ITE data typically does not take into account variations in type and location (suburban versus urban) of proposed land uses, proximity of transit service, and the existence of pedestrian and bicycle facilities. The common use of suburban-focused vehicular trip generation data in the preparation of traffic impact analyses, combined with a lack of information and techniques on how and when to adjust the data, has often resulted in an application of conventional trip generation rates to proposed infill development, even in places that are compact, highly walkable, and transit-rich. This use of conventional data can over-predict vehicular traffic impacts, resulting in possible mitigations that negatively affect use of transit, bicycle, and pedestrian facilities in the infill project area. Inaccurate data may also result in excessive traffic mitigation fees or requirements for additional infrastructure that can hinder the type of development that promotes lower automobile use.

   There is no clear solution as there is currently no common, widely accepted methodology in the U.S. for estimating multi-modal trip-generation rates associated with infill projects. While some studies have been undertaken (see NCHRP Report 758[2]), they have not seen widespread use. Unless the State takes the lead in articulating new multi-modal trip generation rates, local agencies may be left to develop and validate local infill trip rates by sponsoring local infill trip generation studies or extracting region-specific travel data via household travel surveys.

Thank you again for the opportunity to comment and please do not hesitate to contact me with any questions.

Sincerely,

Jim Kemp
Executive Director

[2] Trip Generation Rates for Transportation Impact Analyses of Infill Developments, National Cooperative Highway Research Program, Transportation Research Board, 2013.